

Wayne Alan Matayabas
Provence, Tiffany N v. United States of America, et al

December 15, 2021

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1 UNITED STATES DISTRICT COURT
2 DISTRICT OF SOUTH CAROLINA
3 CHARLESTON DIVISION
4 IN ADMIRALTY

5
6 TIFFANY N. PROVENCE, AS THE PERSONAL
7 REPRESENTATIVE OF THE ESTATE OF JUAN
8 ANTONIO VILLALOBOS HERNANDEZ,

9
10 Plaintiff,

11 vs. CASE NO. 2:21-cv-965-RMG

12 UNITED STATES OF AMERICA, CROWLEY
13 MARITIME CORPORATION, CROWLEY GOVERNMENT
14 SERVICES, INC., DETYENS SHIPYARDS, INC.,
15 AND HIGHTRAK STAFFING, INC. D/B/A HITRAK
16 STAFFING, INC.,

17 Defendants.

18 DEPOSITION OF: WAYNE ALAN MATAYABAS
19 DATE: December 15, 2021
20 TIME: 9:58 a.m.
21 LOCATION: DETYENS SHIPYARDS, INC.
22 1670 Dry Dock Avenue
23 Suite 200
24 North Charleston, SC

25 TAKEN BY: Counsel for the Plaintiff

26 REPORTED BY: MICHAEL DAVID ROBERTS,
27 Court Reporter

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1 A. Detyens had just started quality
2 assurance.

3 Q. And from '98 when you started quality
4 assurance, how long did you do that?

5 A. To 2008. I came to day shift for
6 safety.

7 Q. And then 2008 you started in your
8 present job?

9 A. Yes, sir.

10 Q. And was quality assurance on a
11 project -- you know, were you focused on projects,
12 or were you more focused on the quality of the
13 company's work generally?

14 A. Projects.

15 Q. All right. And since starting with
16 Detyens in -- who hired you in '97? What company?
17 Did you work for Hitrak? Did you work for Detyens?

18 A. Detyens.

19 Q. And since '97, have you been --

20 A. Detyens hired me but as a temporary. I
21 was temporary -- my paycheck was coming through
22 Hitrak for a while, and then I got rolled over to
23 Detyens.

24 Q. So at some point during your
25 employment, you were getting paychecks from Hitrak?

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1 A. Yes, sir.

2 Q. But is it fair to say in the last five
3 years or more you've been getting paychecks from
4 Detyens?

5 A. More like most -- more -- the last 20
6 or something.

7 Q. Last 20 years. Okay. And who's your
8 supervisor at Detyens today?

9 A. Mike Marshall.

10 Q. And so you're in the shop with Mr. --

11 A. EHS.

12 Q. Right -- with Mr. Mooney,
13 Mr. Desjardins and --

14 A. Yes, sir.

15 Q. -- Mr. Lyles; is that right?

16 A. Yes, sir.

17 Q. And you're the senior man in that shop?

18 A. Yes, sir.

19 Q. Okay.

20 A. As far as the safety portion, sir, yes.

21 Q. All right. And tell us, if you would,
22 as the senior safety person there what your sort of
23 general job responsibilities are. How would you
24 describe it to a stranger?

25 A. It varied, but the easiest thing -- the